

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**CONCORD MANAGEMENT AND  
CONSULTING LLC,**

**Defendant.**

**Crim. No. 18-CR-32-2 (DLF)**

**GOVERNMENT’S SUPPLEMENTAL RESPONSE TO DEFENDANT’S MOTION TO  
DISCLOSE *EX PARTE* COMMUNICATIONS BETWEEN THE COURT AND THE  
GOVERNMENT REGARDING THE GOVERNMENT’S INTENTION TO SEEK  
A SUPERSEDING INDICTMENT**

The United States of America, by and through undersigned counsel, respectfully submits this response to the Court’s Minute Order of November 6, 2019, regarding the government’s initial Response to Defendant Concord Management and Consulting’s Motion to Disclose *Ex Parte* Communications Regarding the Government’s Intention to Seek a Superseding Indictment [Dkt. No. 231]. The government hereby submits one additional proposed redaction, to the Court’s October 25, 2019 Minute Order, that is consistent with the redactions proposed to the government’s October 25, 2019 pleading and Court’s October 29, 2019 telephonic hearing transcript. Undersigned counsel apologize for inadvertently omitting this proposed redaction with yesterday’s filing [Dkt. No. 231]. The government is not proposing any redactions to the Court’s Minute Orders of October 29, 2019 or October 31, 2019; the government’s October 28, 2019 pleading; or the government’s October 30, 2019 notice to the Court that the government had notified defense counsel about its intent to seek a superseding indictment in this matter.

Respectfully submitted,

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